1 2 3 4 5 6 7 8	GRANT P. FONDO (SBN 181530) GFondo@goodwinlaw.com GOODWIN PROCTER LLP 601 Marshall Street Redwood City, CA 94063 Tel.: +1 650 752 3100 Fax: +1 650 853 1038 AMANDA H. RUSSO (SBN 319617) ARusso@goodwinlaw.com GOODWIN PROCTER LLP 601 S. Figueroa Street, 41st Floor Los Angeles, CA 90017 Tel.: +1 213 426 2500 Fax: +1 213 623 1673	
9 10	Attorneys for Respondent PAYWARD VENTURES, INC., d/b/a KRAKEN OR KRAKEN.COM	
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12	UNITED STATES DISTRICT COURT	
13	NORTHERN DISTRICT OF CALIFORNIA	
14	SAN FRANCISCO DIVISION	
15		
16	UNITED STATES OF AMERICA,	Case No. 3:23-MC-80029-JCS
17	Plaintiff,	STIPULATION AND [PROPOSED] ORDER CONTINUING SHOW CAUSE
18	V.	HEARING
19	PAYWARD VENTURES INC., d/b/a	Date: May 26, 2023
20	KRAKEN OR KRAKEN.COM, OR ITS PREDECESSORS, SUBSIDIARIES, DIVISIONS, OR AFFILIATES,	Time: 9:30 a.m. Courtroom: Zoom video Judge: Hon. Joseph C. Spero
21	Respondent.	ruage. Tron. resepti e. spere
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	STIPULATION AND [PROPOSED] ORDER CONTINUIN SHOW CAUSE HEARING	NG Case No. 3:23-MC-80029-JCS

1	Respondent Payward Ventures, Inc. ("Kraken") and the United States, by and through their	
2	respective undersigned counsel, stipulate as follows and respectfully request an order from this	
3	Court for a continuance of the May 26, 2023, show cause on the United States' Petition to Enforce	
4	Internal Revenue Service Summons.	
5	Pursuant to the Clerk's Notice Continuing Order to Show Cause and Setting Zoom Hearing	
6	(ECF No. 27), the May 19, 2023 Court hearing date on this matter was re-scheduled to May 26,	
7	2023 at 9:30 a.m. Due to scheduling conflicts for counsel for Kraken, Kraken conferred with the	
8	Government, and the parties stipulated to a request for a brief continuance of the show cause	
9	hearing. The parties have determined that June 9, 2023 would be the first available suitable date	
10	after May 26, 2023 for the show case hearing.	
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12	Respectfully submitted,	
13	Dated: May 19, 2023 GOODWIN PROCTER LLP	
14		
15	By: /s/ Grant P. Fondo GRANT P. FONDO (SBN 181530)	
16	GFondo@goodwinlaw.com AMANDA H. RUSSO (SBN 319617)	
17	ARusso@goodwinlaw.com	
18	Attorneys for Respondent PAYWARD VENTURES, INC., d/b/a	
19	KRAKEN OR KRAKEN.COM	
20		
21	Dated: May 19, 2023 DAVID A. HUBBERT	
22	Deputy Assistant Attorney General	
23	By: /s/ Amy Matchison AMY MATCHISON	
24	Trial Attorney, Tax Division	
25	U.S. Department of Justice	
26	Attorneys for the UNITED STATES	
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	STIPULATION AND [Proposed] Order Continuing	
-	SHOW CAUSE HEARING Case No. 3:23-MC-80029-JCS	

ORDER The above STIPULATION CONTINUING SHOW CAUSE HEARING dated May 19, 2023, is approved and the parties shall comply with its provisions. The hearing date is continued to June 9, 2023, at 9:30 a.m. PDT by Zoom video. Zoom Webinar ID: 161 926 0804. Passcode: 050855. IT IS SO ORDERED. Dated: May 19, 2023. HONORABLE JOSEPH C. SPERO United States Magistrate Judge STIPULATION AND [PROPOSED] ORDER CONTINUING SHOW CAUSE HEARING Case No. 3:23-MC-80029-JCS